

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMIR MOKAYEF,

Defendant.

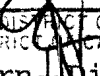
Case No. 15CR 2645 -JLS

I N F O R M A T I O N

Title 18, U.S.C., Sec. 1001(a)(2) -  
**False Statements to a Federal  
Officer (Felony)**

**FILED**

OCT 16 2015

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY  DEPUTY

The United States Attorney charges:

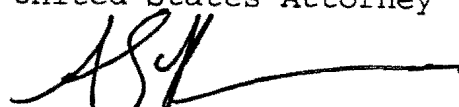
Count 1

On about September 4, 2015, within the Southern District of California, defendant AMIR MOKAYEF knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the United States Government, to wit: the Federal Bureau of Investigation, by stating and representing to FBI Special Agent M. Regula that: (1) he did not know how much of his illegal proceeds he gave to Jan Harald Portocarrero (charged elsewhere), and his best estimate was "a little over a million;" (2) he had not made any plans with Jan Harald Portocarrero for the return of his illegal proceeds; and (3) he had no information about whether Jan Harald Portocarrero still had illegal proceeds; whereas in truth and fact, as defendant then and there well knew, those statements and representations were false, fictitious, and fraudulent when made; in violation of Title 18, United States Code, Section 1001(a)(2).

DATED: October 14, 2015.

LAURA E. DUFFY

United States Attorney

  
ANDREW G. SCHOPLER

ERIC J. BESTE

Assistant U.S. Attorneys